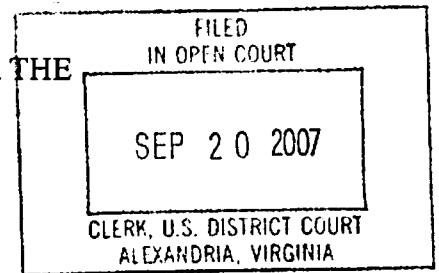


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

No. 1:07cr252

v.

ABDUL HAMEED,

BILAL SALEEM,

NAIM ASLAM MANN,

JAWAD AHMAD, and

ARSHAD HUSSAIN,

Defendants

Conspiracy, 18 U.S.C. § 371
(Count 1)

Continuing Financial Crimes Enterprise, 18
U.S.C. § 225
(Count 2)

Mail Fraud, 18 U.S.C. § 1341
(Counts 3 through 12)

Aggravated Identity Theft, 18 U.S.C.
§ 1028A
(Counts 13 through 16)

Criminal Forfeiture Notice

SUPERSEDING INDICTMENT

September 2007 Term - At Alexandria

COUNT ONE

Conspiracy (18 U.S.C. § 371)

THE GRAND JURY CHARGES THAT:

1. From in or about February 2005 through on or about May 30, 2007, in the Eastern District of Virginia and elsewhere, the defendants, ABDUL HAMEED, BILAL SALEEM, NAIM ASLAM MANN, JAWAD AHMAD, and ARSHAD HUSSAIN, and co-conspirator Basir Chand, knowingly and unlawfully conspired with persons known and unknown to the Grand Jury to commit the following offenses against the United States:

(a) To devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and, for purposes of executing such scheme and artifice, to place in a post office or authorized depository, matter to be delivered by the Postal Service, in violation of Title 18, United States Code, Section 1341; and

(b) To organize, manage, and supervise a continuing financial crimes enterprise – that is, a series of violations of 18 U.S.C. § 1341 affecting a financial institution committed by at least four persons acting in concert – receiving \$5,000,000 or more in gross receipts from such enterprise during a 24-month period, that is, from in or about May 2005 to May 2007, in violation of Title 18, United States Code, Section 225.

2. Specifically, from in or about February 2005 through on or about May 30, 2007, in the Eastern District of Virginia and elsewhere, the defendants knowingly conspired with each other and with others to devise a scheme and artifice to defraud in which the defendants used various false and fraudulent identities that they controlled to obtain numerous credit card accounts, personal and business bank accounts, and mortgage loan accounts.

Purpose, Manner, and Means of the Conspiracy

3. The purpose of the conspiracy was to enrich the defendants and their co-conspirators by fraudulently obtaining money and credit from various credit card issuers, lenders, and financial institutions, and by fraudulently obtaining goods and other things of value from merchants.

The manner and means by which the defendants and their co-conspirators conducted the conspiracy included the following:

4. It was part of the conspiracy that the defendants and their co-conspirators would and did establish bank accounts and obtain lines of credit using false identities and false business names. This included the use of false driver's licenses and identification cards. The defendants established multiple false businesses in which the listed principal of a false business corresponded to one of the false identities. The false businesses were used to fabricate employment and salary information for the false identities, which was then provided by the defendants to credit card companies, leasing offices, mortgage companies, and financial institutions for the purpose of obtaining credit in the names of the false identities.

5. It was further part of the conspiracy that the defendants and their co-conspirators would and did obtain credit, access accounts, receive mail in, and/or otherwise employ, the following false identities, among others, in execution of the scheme and artifice to defraud:

<u>Defendant</u>	<u>False Identity</u>
ABDUL HAMEED	<i>Tahsin Hasan, Babar Kanjoo, Rana Bari, Nisar Ahmed, Muhammad Alvi, Baber Ali, Mohammad Salman, Waheeb Mian, Umer Saleem Asghar, Allahrakha Sulehria, Jay Enterprise, Inc., and Parco, Inc.</i>
BILAL SALEEM	<i>Chopra Kumar, Zulfiqar Ahmad, Joshi Bindu, and Rana Bari</i>
NAIM ASLAM MANN	<i>Baber Ali, Asghar X. Ali, Waheeb Mian</i>
JAWAD AHMAD	<i>Jose Perez and Allahrakha Sulehria</i>
ARSHAD HUSSAIN	<i>Ishtiaq Ahmed, Mohammad Rana, Jamail Budd, Azad Janbaz, Globe and Globe, Inc., Landmark Builder and Developer, Inc., Tahsin Hasan, Responsible Financial Solutions, Inc., Chopra Kumar</i>

6. It was further part of the conspiracy that the defendants and their co-conspirators would and did rent apartments and purchase real properties using false identities. These locations were used to receive United States mail in the names of the false identities and business names and to receive shipments of goods purchased using the false identities and false business names.

7. It was further part of the conspiracy that the defendants and their co-conspirators would and did use credit card accounts established under false identities or business names to make large purchases, conduct balance transfers, and obtain substantial cash advances. One method used by the defendants to fund the personal and business bank accounts established in the false identities was through the deposit of convenience checks written against the credit card accounts. Monies were subsequently transferred between the accounts, often via checks written from personal accounts to business accounts to make it appear that a legitimate purchase or service was transacted. The account balances were then withdrawn by check, wire transfer, or ATM withdrawal.

Overt Acts in Furtherance of the Conspiracy

In furtherance of this conspiracy and to effect the objects thereof, the defendants and their co-conspirators performed the following overt acts in the Eastern District of Virginia and elsewhere:

1. On or about February 3, 2005, HAMEED and his co-conspirators rented P.O. Box 545, Herndon, Virginia, in the name of *Babar Kanjoo*, and began receiving United States mail addressed to several different identities, including *Muhammad Alvi*, *Baber Ali*, *Mohammad Salman*, *Waheeb Mian*, *Umer Saleem Asghar*, and *Parco, Inc.*

2. On or about April 11, 2005, HAMEED and his co-conspirators rented P.O. Box 768, Herndon, Virginia, in the name of *Tahsin Hasan*, and began receiving United States mail addressed to several different identities, including *Rana Bari* and *Nisar Ahmed*.

3. On or about November 21, 2005, the defendants and their co-conspirators fraudulently obtained a mortgage loan for the purchase of 3820 Lightfoot Street, #318, Chantilly, Virginia, by someone who presented a fraudulent Virginia driver's license in the name of *Naeem Malik* as proof of identity.

4. On or about January 27, 2006, the defendants and their co-conspirators fraudulently obtained a mortgage loan for the purchase of 8642 Village Square Drive, Alexandria, Virginia, by someone identifying himself as *Tahsin Hasan*.

5. On or about April 24, 2006, the defendants and their co-conspirators fraudulently obtained a mortgage loan for the purchase of 3830 Lightfoot Street, #327, Chantilly, Virginia, in the Chantilly Park Condominiums, by someone who presented a Virginia driver's license in the name of *Waheeb Mian* as proof of identity, and HAMEED began visiting the Chantilly Park Condominiums identifying himself as *Waheeb Mian*.

6. On or about April 28, 2006, the defendants and their co-conspirators fraudulently obtained a mortgage loan for the purchase of 5934 Sunlight Mountain Road, Spotsylvania, Virginia, by someone who presented an apparently valid Virginia driver's license in the name of *Muhammad Alvi* as proof of identity.

7. In or about April 2006, the defendants and their co-conspirators provided the property management office for 5750 Backlick Road, #202, Springfield, Virginia, with a copy of

a paycheck stub supposedly documenting *Baber Ali's* employment and salary information with *Java Solutions, Inc.*, 3820 Lightfoot Street, Chantilly, Virginia.

8. In or about May 2006, the defendants and their co-conspirators leased an apartment at 6113 Amherst Avenue, #12B, Springfield, Virginia, in the Springfield Garden Apartments, under the name *Patan Datta*, and gave the property management office a fraudulent Texas driver's license which purported to bear *Patan Datta's* date of birth and Texas identification number.

9. On or about July 12, 2006, MANN and his co-conspirators deposited into Wachovia Bank account number xxxxxxxxx6433 a \$19,800.00 convenience check written against a Citibank, N.A., credit card account in the name of *Baber Ali*.

10. On or about July 14, 2006, August 16, 2006, and August 31, 2006, MANN conducted ATM withdrawals on Wachovia Bank account number xxxxxxxxx6433 in the name of *Baber Ali* at the 5750 Backlick Road, #202, address.

11. On or about August 21, 2006, MANN and his co-conspirators deposited into Wachovia Bank account number xxxxxxxxx6433 a \$8,350.00 convenience check written against a First USA Management Services, Inc., credit card account in the name of *Baber Ali*.

12. On or about August 31, 2006, MANN and his co-conspirators deposited into Wachovia Bank account number xxxxxxxxx6433 two convenience checks totaling \$20,650.00 written against First USA Management Services, Inc., credit card accounts in the name of *Baber Ali*.

13. On or about September 8, 2006, HAMEED possessed and then discarded paper items into a trash chute in the parking garage at Chantilly Park Condominiums, including a

handwritten document torn in several pieces, which, when pieced together, revealed the following: "*Allah Rakha Sulehria*, xxx-xx-9851, xx-xx-1960, 5934 Sunlight Mountain Rd. Spotsylvania, Virginia 22553, Bus: *Yasin Sons LLC*, 1050 Connecticut Ave, 10 floor, Washington, DC 20036, phone: 202-772-4277, fax 202-772-3101."

14. On or about September 21, 2006, HAMEED possessed and then discarded paper items into the apartment complex trash dumpster at the 5750 Backlick Road address, including credit card statements in the name of *Baber Ali* and *Jay Enterprise, Inc.*

15. On or about September 28, 2006, the defendants and their co-conspirators fraudulently obtained a mortgage loan for the purchase of real property located at 9202 Forest Greens Drive, Lorton, Virginia, by someone identifying himself as *Tahsin Hasan* using a fraudulent Virginia driver's license as proof of identification.

16. In or about September 2006, the defendants and their co-conspirators received mail at the 3820 Lightfoot Street, #318, address from various financial institutions and credit card companies addressed to *Begum Jahan*, *Kuraj Sinha*, *Naeem Malik*, *Java Solutions, Inc.*, and *Jacob Investment, Inc.*

17. In or about September and October 2006, the defendants and their co-conspirators received mail at the 3830 Lightfoot Street, #327, address from various financial institutions and credit card companies addressed to *Umer Asghar*, *Waheeb Mian*, *Majid Iqbal*, *Ifthikhar Ahmed*, and *Khawaja Ahmed*.

18. In or about September 2006 and October 2006, the defendants and their co-conspirators received mail at the 5750 Backlick Road, #202, address from various financial

institutions and credit card companies addressed to *Baber Ali, Rana Bari, and Jay Enterprise, Inc.*

19. In or about September 2006 through December 2006, the defendants and their co-conspirators received U.S. mail at the 5934 Sunlight Mountain Road address from various financial institutions and credit card companies addressed to *Allahrakha Sulehria, Mohammad Rana, Muhammad Alvi, Danish Cheema, Nationwide Marketing, Inc., and Landmark Builder and Developer, Inc.*

20. In or about November 2006 and December 2006, the defendants and their co-conspirators received mail at the 6113 Amherst Avenue, #12B, address from various financial institutions and credit card companies addressed to *Patan Datta, Chopra Kumar, Jamail Budd, and Legal Solution Resources, Inc.*

21. In or about December 2006 and January 2007, the defendants and their co-conspirators received mail at the 9202 Forest Greens Drive address from a mortgage lender addressed to *Tahsin Hasan.*

22. On or about January 24, 2007, HUSSAIN possessed and then discarded pieces of three credit cards into the dumpster at the 6113 Amherst Avenue apartment complex, including a United Mileage Plus Visa, account number xxxx xxxx xxxx 5616, in the name of *Ishtiaq Ahmed, Globe and Globe, Inc.*; a Citi AAdvantage MasterCard, account number xxxx xxxx xxxx 2450, in the name of *Ishtiaq Ahmed*; and a Citi AAdvantage MasterCard, account number xxxx xxxx xxxx 5593, in the name of *Tahsin Hasan.*

23. On or about April 16, 2007, MANN deposited \$10,000 cash into a Wachovia Bank account in the name of HAMEED's wife.

24. On or about February 6, 2007, HUSSAIN possessed and then discarded a Wachovia Bank envelope and an Orchard Bank envelope, both addressed to *Jamail Budd* at the 6113 Amherst Avenue, #12B, address, into the apartment complex trash dumpster at the 6113 Amherst Avenue address.

25. On or about May 30, 2007, JAWAD AHMAD activated two credit cards in the name of *Jose Perez*.

26. From in or about September 2005 to December 2006, the defendants and their co-conspirators caused a total of approximately \$187,967 in deposits to and approximately \$187,943 in withdrawals from the Wachovia Bank account number xxxxxxxxxx5448, in the name of *Waheeb Mian*, including the following:

a. The deposit of a convenience check in the amount of \$8,700 from an account in the name of *Waheeb Mian* at Washington Mutual Bank;

b. The deposit of two convenience checks totaling \$27,900 from accounts in the name of *Waheeb Mian* at Citibank, N.A.;

c. The deposit of two convenience checks totaling \$29,950 from an account in the name of *Waheeb Mian* at U.S. Bank, N.A.;

d. The deposit of two checks totaling \$64,200 from accounts in the name of *Waheeb Mian* at Indymac Bank; and

e. Two international wire transfers totaling \$148,000 to an account in Pakistan in the name of Quaiser Aftab Ahm.

27. From in or about November 2005 to May 2006, the defendants and their co-conspirators caused a total of approximately \$95,096 in deposits to and approximately \$94,954 in

withdrawals from the Wachovia Bank account number xxxxxxxxx3573 in the name of *Kuraj Sinha*, including the following:

- a. Approximately \$57,900 in deposits of convenience checks drawn on accounts in the name of *Kuraj Sinha* at First USA Management Services, Inc., Citibank, N.A., and U.S. Bank, N.A.;
- b. International wire transfers of \$46,000 to an account in Lahore, Pakistan in the name of Hafiz Kaleem Ahmad; and
- c. A check in the amount of \$41,530 written on this account and deposited into an account in Lahore, Pakistan.

28. From in or about March 2006 to May 2006, the defendants and their co-conspirators caused a total of approximately \$90,200 in deposits to and approximately \$90,192 in withdrawals from the Wachovia Bank account number xxxxxxxxx2954, in the name of *Begum S. Jahan*, including the following:

- a. Approximately \$66,400 in deposits of convenience checks drawn on accounts in the name of *Begum S. Jahan* at Citibank, N.A., and Bank of America;
- b. A check in the amount of \$40,000 written on this account and deposited into an account in the name of Hafiz Kaleem Ahmad in Lahore, Pakistan; and
- c. A check in the amount of \$39,700 written on this account and deposited into an account in the name of Hafiz Kaleem Ahmad in Lahore, Pakistan.

29. From in or about April 2006 to October 2006, the defendants and their co-conspirators caused a total of approximately \$119,103 in deposits to and approximately \$119,

103 in withdrawals from the Wachovia Bank account number xxxxxxxxx6433, in the name of *Baber Ali*, including the following:

- a. Approximately \$41,050 in deposits of convenience checks drawn on accounts in the name of *Baber Ali* at First USA Management Services, Inc.;
- b. Approximately \$51,600 in deposits of convenience checks drawn on accounts in the name of *Baber Ali* at Citibank, N.A.;
- c. A \$20,000 international wire transfer to Pakistan; and
- d. Two international wire transfers to Pakistan totaling \$45,500.

30. From in or about September 2006 to December 2006, the defendants and their co-conspirators caused a total of approximately \$91,100 in deposits to and approximately \$91,092 in withdrawals from the Wachovia Bank account number xxxxxxxxx4342 in the name of *Globe and Globe, Inc.*, including the following:

- a. Approximately \$29,700 in deposits from accounts in the name of *Ishtiaq Ahmed* at First USA Management Services, Inc. and Bank of America;
- b. Approximately \$21,800 in deposits from accounts in the name of *Tahsin Hasan* at Citibank, N.A.; and
- c. ATM cash withdrawals of approximately \$41,766.

31. From in or about October 2006 to January 2007, the defendants and their co-conspirators caused a total of approximately \$70,060 in deposits to and approximately \$63,351 in withdrawals from the Wachovia Bank account number xxxxxxxxx5496 in the name of *Chopra Kumar*, including the following:

a. Approximately \$35,300 in deposits of convenience checks drawn on accounts in the name of *Chopra Kumar* at First USA Management Services, Inc., Citibank, N.A., and FIA Card Services;

b. Approximately \$8,250 in deposits from accounts in the name of *Legal Solutions Resources, Inc.*;

c. Approximately \$17,500 in checks written to *Patan Datta*;

d. A check in the amount of \$3,000 written to *Jamail Budd*;

e. ATM cash withdrawals of approximately \$28,140.

(In violation of Title 18, United States Code, Section 371.)

COUNT TWO

Continuing Financial Crimes Enterprise (18 U.S.C. § 225)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations contained in paragraphs 1 through 7 of Count One are incorporated here by reference.
2. From in or about February 2005 through on or about May 30, 2007, in the Eastern District of Virginia and elsewhere, the defendants, ABDUL HAMEED, BILAL SALEEM, NAIM ASLAM MANN, JAWAD AHMAD, and ARSHAD HUSSAIN, knowingly and unlawfully organized, managed, and supervised a continuing financial crimes enterprise – that is, a series of violations of 18 U.S.C. § 1341 affecting a financial institution committed by at least four persons acting in concert – and received \$5,000,000 or more in gross receipts from such enterprise during a 24-month period, that is from in or about May 2005 to May 2007.
3. The continuing financial crimes enterprise alleged in this Superseding Indictment affected the following credit card issuers and lenders, among others, which are financial institutions within the meaning of 18 U.S.C. § 20:
 - a. Citibank, N.A., a federally-insured financial institution;
 - b. Wells Fargo Home Mortgage, doing business as America's Servicing Company, a division of Wells Fargo Bank, N.A., a federally-insured financial institution;
 - c. Chase Bank USA, N.A., a federally-insured financial institution;
 - d. Bank of America, N.A., a federally-insured financial institution;
 - e. HSBC Bank USA, N.A., a federally-insured financial institution; and
 - f. U.S. Bank, N.A., a federally-insured financial institution.

(In violation of Title 18, United States Code, Section 225.)

COUNTS THREE THROUGH TWELVE

Mail Fraud (18 U.S.C. § 1341)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations contained in paragraphs 1 through 7 of Count One are incorporated here by reference.
2. From in or about February 2005 through on or about May 30, 2007, in the Eastern District of Virginia and elsewhere, the defendants, ABDUL HAMEED, BILAL SALEEM, NAIM ASLAM MANN, JAWAD AHMAD, and ARSHAD HUSSAIN, knowingly and unlawfully devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises.
3. On or about the dates below, for the purpose of executing and attempting to execute the foregoing scheme and artifice, the defendants placed and caused to be placed in a post office and authorized depository for mail matter, the following matter and things to be delivered by the Postal Service, each such mailing constituting a separate violation affecting the financial institution indicated:

<u>Count</u>	<u>Date</u>	<u>Mail Matter</u>	<u>To</u>	<u>From</u>
3	09/08/06	Correspondence	<i>Kuraj Sinha</i> 3820 Lightfoot Street, #318	U.S. Bank
4	09/22/06	Account Statement	<i>Tahsin Hasan</i> <i>Responsible Financial</i> <i>Solutions, Inc.</i> 8642 Village Square Drive	Citibank
5	10/17/06	Account Statement	<i>Azad Janbaz</i> 7326 Charlotte Street	Chase Bank

6	11/15/06	Account Statement	<i>Allahrakha Sulehria</i> <i>Nationwide Marketing, Inc.</i> 5934 Sunlight Mountain Road	Chase Bank
7	11/27/06	Account Statement	<i>Tahsin Hasan</i> 8642 Village Square Drive	Bank of America
8	11/28/06	Account Statement	<i>Ishtiaq Ahmed</i> 8642 Village Square Drive	Chase Bank
9	12/05/06	Account Statement	<i>Azad Janbaz</i> 7326 Charlotte Street	Chase Bank
10	01/11/07	Account Statement	<i>Azad Janbaz</i> 7326 Charlotte Street	Bank of America
11	03/31/07	Account Statement	<i>Danish Cheema</i> 4381 Palton Drive Dumfries, Virginia	HSBC Bank
12	04/21/07	Correspondence	<i>Zubair Idris</i> <i>Vision 3 Solutions, Inc.</i> 4250 Hudson River Court	U.S. Bank

(In violation of Title 18, United States Code, Section 1341.)

COUNTS THIRTEEN THROUGH SIXTEEN

Aggravated Identity Theft (18 U.S.C. § 1028A)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations contained in paragraphs 1 through 7 of Count One are incorporated here by reference.
2. On or about the dates below, in the Eastern District of Virginia, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c) – that is, a violation of 18 U.S.C. § 1341 (mail fraud) – the defendants, ABDUL HAMEED, BILAL SALEEM, NAIM ASLAM MANN, JAWAD AHMAD, and ARSHAD HUSSAIN, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person – that is, the names and numbers identified below in redacted form – each such transfer, possession, and use constituting a separate violation:

<u>Count</u>	<u>Date</u>	<u>Location</u>	<u>Means of Identification</u>
13	04/20/06	Chantilly, Virginia	<i>Waheed Mian/Waheeb Mian</i> (name) xxx-xx-3386 (social security number)
14	04/28/06	Spotsylvania, Virginia	<i>Muhammad Alvi</i> (name) xxx-xx-6329 (social security number) xx-xx-1976 (date of birth)
15	08/17/06	Lorton, Virginia	<i>Joshi Bindu/Bindu Joshi</i> (name) xxx-xx-6206 (social security number) xx-xx-1973 (date of birth)
16	12/27/06	Lorton, Virginia	<i>Zulfiqar Ahmad/Zulfiqar Ahmed</i> (name) xxx-xx-0698 (social security number)

(In violation of Title 18, United States Code, Section 1028A(a)(1).)

CRIMINAL FORFEITURE NOTICE

THE GRAND JURY FURTHER CHARGES THAT:

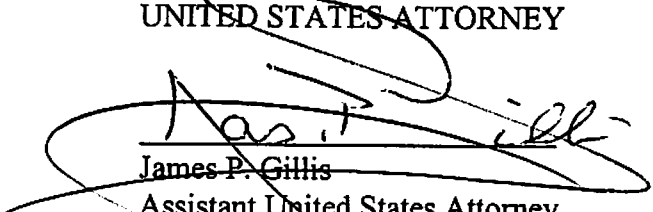
If convicted of Count 1 and/or any of Counts 3 through 12 of this Superseding Indictment, each defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the count or counts of conviction. This property includes, but is not limited to, \$5,000,000, which represents the proceeds obtained by the defendants during the course of each offense of conviction, and for which amount all of the defendants convicted on at least one of those counts are jointly and severally liable.

(Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(2), 28 U.S.C. § 2461, and 21 U.S.C. § 853.)

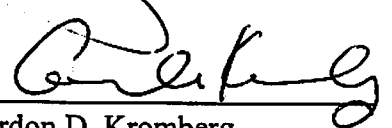
A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.
~~FOREPERSON~~

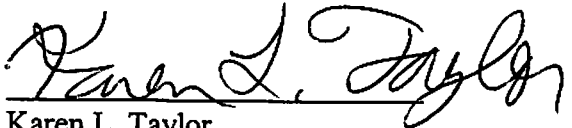
CHUCK ROSENBERG
UNITED STATES ATTORNEY



James P. Gillis
Assistant United States Attorney



Gordon D. Kromberg
Assistant United States Attorney



Karen L. Taylor
Assistant United States Attorney